

Joint Responses and Objections to Plaintiff's First Set of Requests for Admission; (v) all other exhibits and attachments filed simultaneously herewith, and (vi) all matters of record.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and enter summary judgment in favor of Plaintiff and against each of the Defendants, jointly and severally, for Plaintiff's recovery of the outstanding amounts owed under the Notes, in the following maximum amounts as to each Defendant:

(i) Judgment against Defendant Gene Dunwody, Jr. for the maximum portion of all amounts due, owing, and accruing under the Notes and applicable law which he guaranteed would be paid under the terms of his respective Guaranties, in the amount of \$185,304.76 as of December 19, 2014, plus additional interest, expenses, costs, and attorneys' fees as same continue to accrue from such date forward;

(ii) Judgment against Defendant Gene Dunwody, Sr. for the maximum portion of all amounts due, owing, and accruing under the Notes and applicable law which he guaranteed would be paid under the terms of his respective Guaranties, in the amount of \$185,304.76 as of December 19, 2014, plus additional interest, expenses, costs, and attorneys' fees as same continue to accrue from such date forward;

(iii) Judgment against Defendant Jack W. Jenkins for the maximum portion of all amounts due, owing, and accruing under the Notes and applicable law which he guaranteed would be paid under the terms of his respective Guaranties, in the amount of \$185,304.76 as of December 19, 2014, plus additional interest, expenses, costs, and attorneys' fees as same continue to accrue from such date forward;

(iv) Judgment against Defendant W. Tony Long for the maximum portion of all amounts due, owing, and accruing under the Notes and applicable law which he guaranteed

would be paid under the terms of his respective Guaranties, in the amount of \$185,304.76 as of December 19, 2014, plus additional interest, expenses, costs, and attorneys' fees as the same have accrued as of such date and continue to accrue; and

(v) such other relief in favor of Plaintiff as the Court deems just, equitable and proper.

Dated: December 22, 2014.

Respectfully submitted,

/s/ Sean A. Gordon

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CERTIFICATE OF SERVICE

I certify that that on December 22, 2014 I electronically filed the foregoing *Plaintiff's Motion for Summary Judgment* with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorney(s) of record.

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